

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

DOW JONES & COMPANY, INC. d/b/a THE WALL STREET JOURNAL, a Delaware corporation, NEWS CORPORATION, a Delaware corporation, KEITH RUPERT MURDOCH, an individual, ROBERT THOMSON, an individual, KHADEEJA SAFDAR, an individual, and JOSEPH PALAZZOLO, an individual,

Defendants.

Case No.:

**COMPLAINT AND DEMAND
FOR JURY TRIAL**

Plaintiff President Donald J. Trump (“Plaintiff” or “President Trump”), by and through his counsel, sues Defendants, Dow Jones & Company, Inc. d/b/a The Wall Street Journal (“Dow Jones”), News Corporation (“News Corp”), Keith Rupert Murdoch (“Murdoch”), Robert Thomson (“Thomson”), Khadeeja Safdar (“Safdar”), and Joseph Palazzolo (“Palazzolo”) (together, “Defendants”), and alleges as follows:

NATURE OF THE ACTION

“Grounded in facts, shaped by experience, and defined by editorial standards that don’t waver.” Dow Jones & Company, Inc.—the publisher of The Wall Street Journal newspaper—proudly proclaims this maxim across the banner of its website, holding itself out to the world as an honest and forthcoming broker of newsworthy material. And yet, Defendants’ malicious, deliberate, and despicable actions that give rise to this action show plainly that they do not practice what they preach.

On July 17, 2025, Defendants Khadeeja Safdar and Joseph Palazzolo co-authored and published an article largely focused on President Trump that falsely claimed that he authored, drew, and signed a card to wish the late—and utterly disgraced—Jeffrey Epstein a happy fiftieth birthday. To attempt and inextricably link President Trump to Epstein, Defendants Safdar and Palazzolo falsely claim that the salacious language of the letter is contained within a hand-drawn naked woman, which was created with a heavy marker. Worse, Defendants Safdar and Palazzolo falsely represent *as fact* that President Trump drew the naked woman’s breasts and signed his name “Donald” below her waist, “mimicking pubic hair.”

Perplexingly, however, the “letter” is a “typewritten note styled as an imaginary conversation between Trump and Epstein, written in the third person.” Indeed, Defendants Safdar and Palazzolo provide a series of quotes from the nonexistent letter, claiming that the letter was written in third person, beginning with a voice over interluding a conversation, followed by a purported dialogue between President Trump and Epstein—as if they were characters in a play.

On the one hand, Defendants Safdar and Palazzolo falsely pass off *as fact* that President Trump, in 2003, wrote, drew, and signed this letter. And on the other hand, Defendants Safdar and Palazzolo failed to attach the letter, failed to attach the alleged drawing, failed to show proof that President Trump authored or signed any such letter, and failed to explain how this purported letter was obtained. The reason for those failures is because no authentic letter or drawing exists. Defendants concocted this story to malign President Trump’s character and integrity and deceptively portray him in a false light.

Despite the glaring failures in journalistic ethics and standards of accurate reporting, Defendants Dow Jones and News Corp—at the direction of Defendants Murdoch and Thomson—published to the world the false, defamatory, and malignant statements authored by Defendants

Safdar and Palazzolo. Hundreds of millions of people have already viewed the false and defamatory statements published by Defendants. And given the timing of the Defendants' article, which shows their malicious intent behind it, the overwhelming financial and reputational harm suffered by President Trump will continue to multiply.

PARTIES

1. Plaintiff President Donald J. Trump ("Plaintiff") is a private citizen of the United States, a resident of the state of Florida, and is the 45th and 47th President of the United States of America.

2. Defendant Dow Jones & Company, Inc. d/b/a The Wall Street Journal ("Dow Jones") is a Delaware corporation with its principal place of business in New York, New York. Dow Jones publishes The Wall Street Journal, which is a registered trademark owned by Dow Jones encompassing the newspaper that knowingly and recklessly published the numerous false, defamatory, and disparaging statements contained in the below-defined article.

3. Defendant News Corporation ("News Corp") is a Delaware corporation with its principal place of business in New York, New York. News Corp is a holding company that wholly owns Dow Jones and oversees its corporate governance.

4. Defendant Keith Rupert Murdoch ("Murdoch") is a natural person over the age of eighteen and, upon information and belief, is a resident of New York, New York. Murdoch is a director and majority owner of News Corp.

5. Defendant Robert Thomson ("Thomson") is a natural person over the age of eighteen and, upon information and belief, is a resident of New York, New York. Thomson is the Chief Executive Officer of News Corp.

6. Defendant Khadeeja Safdar (“Safdar”) is a natural person over the age of eighteen and, upon information and belief, is a resident of New York, New York. Safdar is a co-author of the numerous false, defamatory, and disparaging statements contained in the below-defined article.

7. Defendant Joseph Palazzolo (“Palazzolo”) is a natural person over the age of eighteen and, upon information and belief, is a resident of New York, New York. Safdar is a co-author of the numerous false, defamatory, and disparaging statements contained in the below-defined article.

JURISDICTION AND VENUE

8. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a) as the parties are diverse, and the amount in controversy is greater than \$75,000.00.

9. The Court possesses personal jurisdiction over Defendants Dow Jones and News Corp pursuant to Florida Statute § 48.193(2) on the grounds that, during the operative period alleged in the Complaint, they engaged in substantial and not isolated business activities in Florida, and more specifically in this District. By way of illustration, Defendants Dow Jones and News Corp publish the Wall Street Journal for daily circulation throughout Florida and in this District. Moreover, Defendants Dow Jones and News Corp publish online news reports at www.wsj.com.

10. In addition, this Court possesses personal jurisdiction over Defendants pursuant to:
- a. Florida Statute §48.193(1)(a)(1) because Defendants Dow Jones and News Corp operate, conduct, engage in, or carry on a business in this state or have an office or agency in this state;
 - b. Florida Statute §48.193(1)(a)(2) on the grounds that all Defendants committed a tortious act in this state (as alleged in this Complaint); and

- c. Florida Statute §48.193(1)(a)(6) on the grounds that Defendants caused injury to President Trump within this state arising out of an act or omission by Defendants outside this state, while at or about the time of the injury, products, materials, or things processed, serviced, or manufactured by Defendants were used or consumed within this state in the ordinary course of commerce, trade, or use.

11. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2) and (b)(3) because a substantial part of the events or omissions giving rise to President Trump's claims occurred in this District by virtue of the transmission and publication of the false and defamatory statements in this district (and elsewhere) and also because Defendants are subject to this Court's personal jurisdiction with respect to this action.

STATEMENT OF FACTS

A. The Article.

12. On July 15, 2025, Palazzolo sent an email to White House Press Secretary Karoline Leavitt advising of Dow Jones' intent to publish an article which discussed a purported letter sent by President Trump to Epstein for Epstein's fiftieth birthday.

13. That same afternoon, counsel for President Trump sent an email to Defendants advising that the intended article was false in claiming that President Trump authored the purported letter, which he did not, and further warned Dow Jones to cease and desist from publishing, disseminating, or otherwise distributing such information, because it was false and defamatory.

14. None of the Defendants responded to the email.

15. Instead, on July 17, 2025, Defendants published, or caused the publishing of, the article authored by Defendants Safdar and Palazzolo titled “Jeffrey Epstein’s Friends Sent Him Bawdy Letters for a 50th Birthday Album. One was from Donald Trump” (the “Article”).

16. The Article was published in The Wall Street Journal as an exclusive.¹ However, since publication, Defendants have widely disseminated it to hundreds of millions of people worldwide.

17. Therein, Defendants falsely and maliciously stated that President Trump supposedly authored, drew, and signed a letter wishing Epstein a happy fiftieth birthday.

18. Defendants elaborated on their false, defamatory, unsubstantiated, and disparaging claims against President Trump by claiming that he drew an outline of a naked woman, drew breasts on her, and signed his name below her waist “mimicking pubic hair.”

19. Next, Defendants further maligned President Trump by wrongly and ludicrously contending that inside of the naked woman that he allegedly drew lies a “typewritten note styled as an imaginary conversation between Trump and Epstein, written in the third person.”

20. This is the entirety of that “imaginary conversation”:

“Voice Over: ‘There must be more to life than having everything,’
the note began.

Donald: Yes, there is, but I won’t tell you what it is.

Jeffrey: Nor will I, since I also know what it is.

Donald: We have certain things in common, Jeffrey.

Jeffrey: Yes, we do, come to think of it.

¹ “Jeffrey Epstein’s Friends Sent Him Bawdy Letters for a 50th Birthday Album. One was from Donald Trump” WALL STREET JOURNAL (last visited July 18, 2025) (https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common-f918d796?mod=hp_lead_pos7).

Donald: Enigmas never age, have you noticed that?

Jeffrey: As a matter of fact, it was clear to me the last time I saw you.

Donald: A pal is a wonderful thing. Happy Birthday — and may every day be another wonderful secret.”

21. Despite these unsubstantiated claims, however, the Article does not attach the purported letter, does not identify the purported drawing, nor does it show any proof that President Trump has anything to do with it.

22. Tellingly, the Article does not explain whether Defendants have obtained a copy of the letter, have seen it, have had it described to them, or any other circumstances that would otherwise lend credibility to the Article. That is because the supposed letter is a fake and the Defendants knew it when they chose to deliberately defame President Trump.

23. On the one hand, the Article states “It isn’t clear how the letter with Trump’s signature was prepared.” And yet, on the other hand, the Defendants pass off the false, defamatory, disparaging, and inflammatory statements in the Article *as fact*, falsely claiming without substantiation that President Trump is a “friend,” “pal,” or “family” of Epstein.

24. Indeed, the Article contains the following false statements that are defamatory *per se*:

- a. ***“The letter bearing Trump’s name, which was reviewed by the Journal, is bawdy—like others in the album. It contains several lines of typewritten text framed by the outline of a naked woman, which appears to be hand-drawn with a heavy marker. A pair of small arcs denotes the woman’s breasts, and the future president’s signature is a squiggly “Donald” below her waist, mimicking pubic hair.”***
- b. ***“It isn’t clear how the letter with Trump’s signature was prepared. Inside the outline of the naked woman was a typewritten note styled as an imaginary conversation between Trump and Epstein, written in the third person.”***

- c. “Voice Over: There must be more to life than having everything,” the note began. **Donald:** *Yes, there is, but I won’t tell you what it is. Jeffrey: Nor will I, since I also know what it is. Donald: We have certain things in common, Jeffrey. Jeffrey: Yes, we do, come to think of it. Donald: Enigmas never age, have you noticed that? Jeffrey: As a matter of fact, it was clear to me the last time I saw you. Donald: A pal is a wonderful thing. Happy Birthday — and may every day be another wonderful secret.*

25. The Article also contains the following statements that are implicitly defamatory:

- a. **“Jeffrey Epstein’s Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump.”**
- b. “It was Jeffrey Epstein’s 50th birthday, and Ghislaine Maxwell was preparing a special gift to mark the occasion. ***She turned to Epstein’s family and friends. One of them was Donald Trump.***”
- c. “The album had poems, photos and greetings from businesspeople, academics, Epstein’s former girlfriends and ***childhood pals***, according to the documents reviewed by the Journal and people familiar with them.”
- d. “When he turned 50, Epstein was already wealthy from managing Wexner’s fortune and was ***socializing with Trump***, Clinton and other powerful people. ***He often entertained at his Manhattan townhouse, Palm Beach, Fla., home and private Caribbean island.***”

26. Despite the clear journalistic failures of due diligence and accuracy of the Article, Dow Jones—at the direction of its director and majority owner Murdoch—and News Corp—at the direction of its CEO Thomson—published the Article to hundreds of millions of people.

27. Notably, Murdoch and Thomson authorized the publication of the Article after President Trump put them both on notice that the letter was fake and nonexistent.

B. The Article goes Viral.

28. Within hours of its publication, the Article went viral on television, internet, social media, and all other modes of communication.

29. The Article was also widely republished and discussed on the internet’s watering hole: X.com.

30. The Wall Street Journal amplified the engagement of the Article by republishing it on its X account—to all 20,800,000 of its followers.² Thus far, it has received over 6,800,000 unique impressions.

31. To further exacerbate this already caustic situation, The Wall Street Journal also placed the Article on the front page of its July 18, 2025, newspaper³:

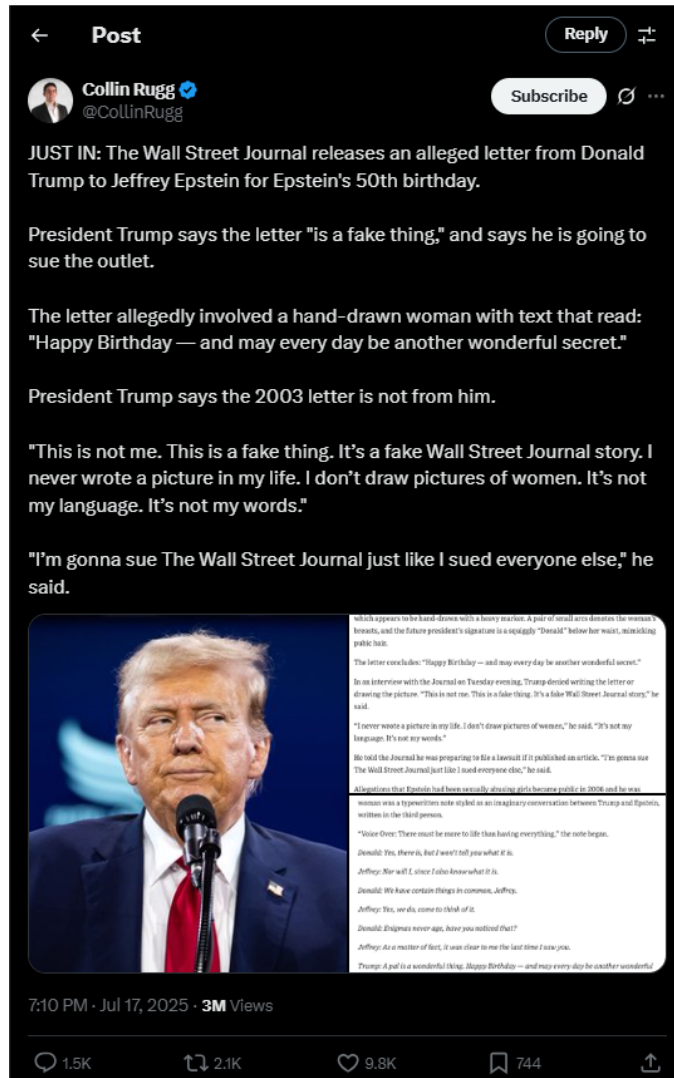


² <https://x.com/WSJ/status/1945979106480316636> WALL STREET JOURNAL @WSJ (last visited July 18, 2025).

³ <https://x.com/WSJ/status/1946064934359433300> WALL STREET JOURNAL @WSJ (last visited July 18, 2025).

32. The Lincoln Project, a known anti-Trump organization, republished the Article to all 2,800,000 of its followers.⁴ As of this writing, it has received over 229,700 unique impressions.

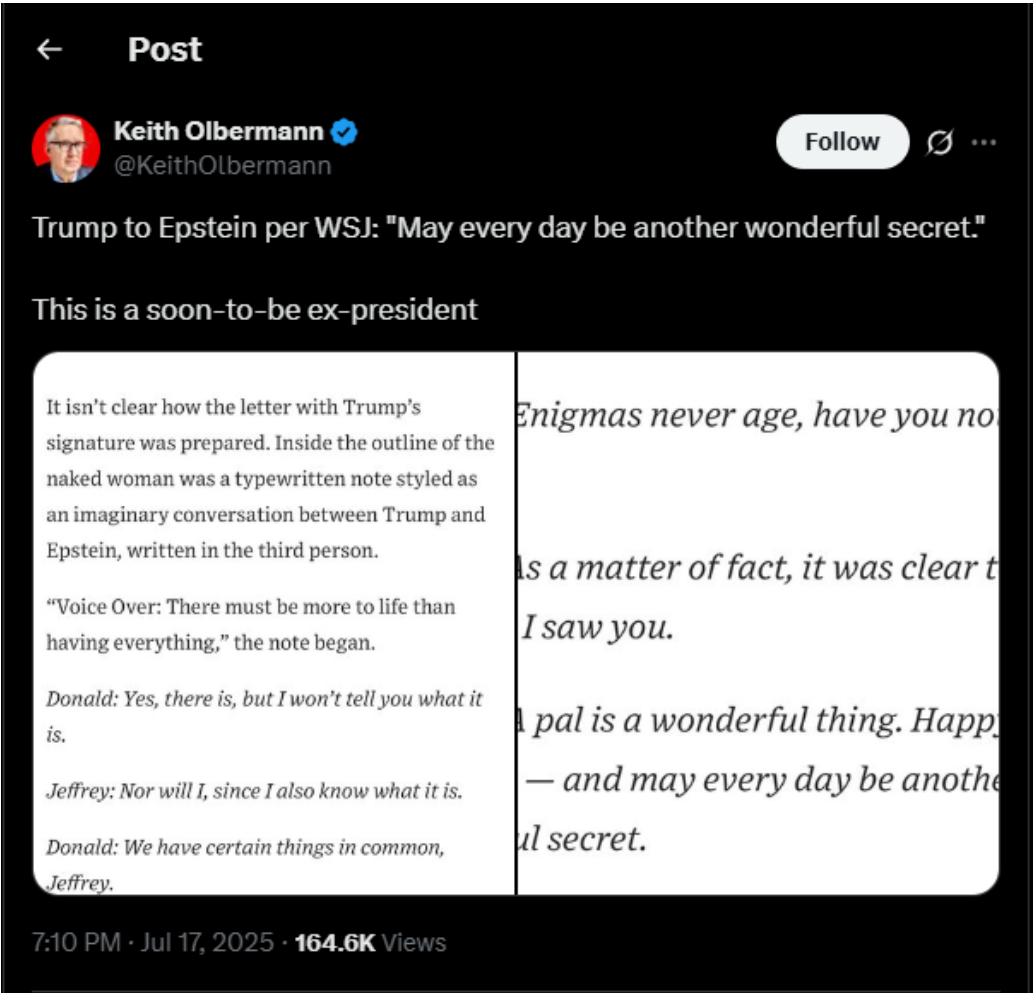
33. Collin Rugg, a journalist with over 1,800,000 followers on X.com, republished several of the false and defamatory statements contained in the Article, as well as powerful denials by President Trump.⁵ To date, it has received over 3,500,000 unique impressions:



⁴ <https://x.com/ProjectLincoln/status/1945987811812741455> THE LINCOLN PROJECT @PROJECTLINCOLN (last visited July 18, 2025).

⁵ <https://x.com/CollinRugg/status/1945984541266702745> COLLIN RUGG @COLLINRUGG (last visited July 18, 2025).

34. Keith Olbermann, a podcaster with over 900,000 followers on X.com, republished several of the false and defamatory statements contained in the Article.⁶ To date, it has received over 200,000 unique impressions:



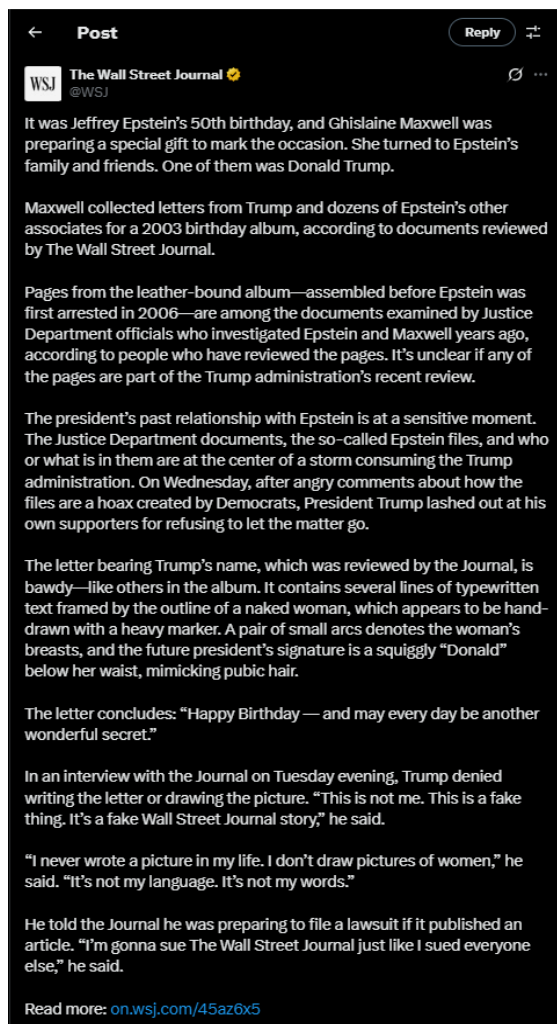
35. Ken Klippenstein, an independent social media influencer with over 543,000 followers on X.com, republished the headline and several false and defamatory statements from the Article.⁷ To date, his republication has received over 1,000,000 unique impressions.

⁶ <https://x.com/KeithOlbermann/status/1945984602612310262> KEITH OLBERMANN @KEITHOLBERMANN (last visited July 18, 2025).

⁷ <https://x.com/kenklippenstein/status/1945981689970266505> KEN KLIPPENSTEIN @KENKLIPPENSTEIN (last visited July 18, 2025).

36. Seth Abramson, a self-described biographer and New York Times best-selling author, republished the Article in its entirety to his over 829,800 followers on X.com.⁸ Thus far, his post has received over 2,800,000 unique impressions.

37. The following morning, July 18, 2025, Defendants continued to amplify the defamatory statements contained in the Article, adding over 440,000 unique impressions⁹:



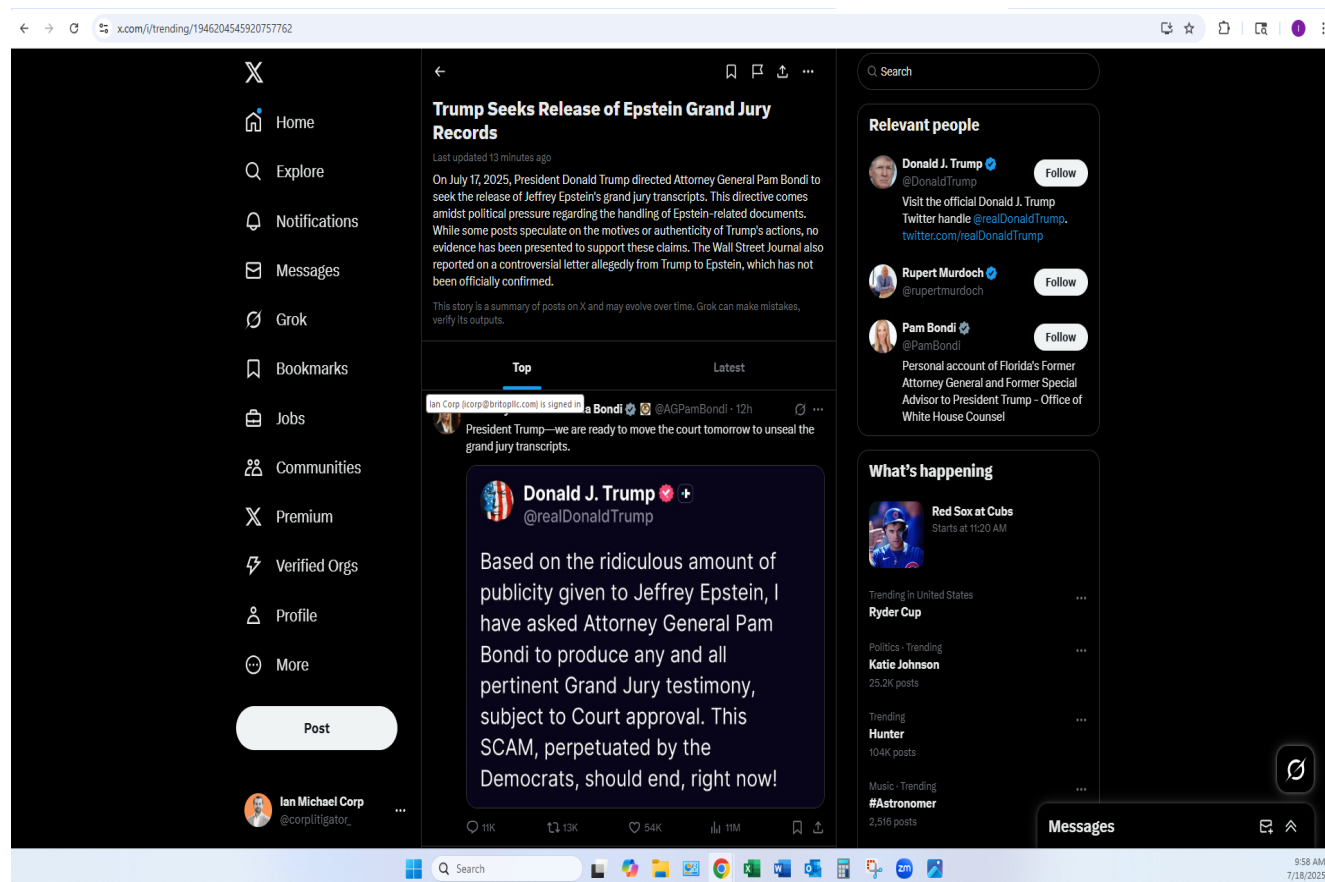
⁸ <https://x.com/SethAbramson/status/1945990177920373225>
@SETHABRAMSON (last visited on July 18, 2025).

SETH ABRAMSON

⁹ <https://x.com/wsj/status/1946213796663775629?s=46> THE WALL STREET JOURNAL
@WSJ (last visited on July 18, 2025).

38. Indeed, Defendants are actively promoting the Article by displaying at the center of The Wall Street Journal's landing page on www.wsj.com.

39. Moreover, as of July 18, 2025, the Article was the number one trending topic on X.com¹⁰:



40. In addition, multiple media outlets republished, adopted, and endorsed the false, defamatory, disparaging, and inflammatory statements in the Article, including, but not limited to,

¹⁰ "Trump Seeks Release of Epstein Grand Jury Records" X.COM (last visited on July 18, 2025) (<https://x.com/i/trending/1946204545920757762>).

CNN,¹¹ MSNBC,¹² CNBC.¹³ Variety,¹⁴ Politico,¹⁵ People Magazine,¹⁶ The Independent,¹⁷ The Guardian,¹⁸ and Rolling Stone.¹⁹

41. Although these articles, transmissions, and social media posts and articles are only a fraction of the impressions and engagement that have been generated by the Article, the false,

¹¹ “Wall Street Journal: Birthday letter to Epstein bore Trump’s signature, drawing of naked woman” CABLE NEWS NETWORK (last visited July 18, 2025) (<https://www.cnn.com/2025/07/17/politics/epstein-birthday-letter-trump>).

¹² “WSJ: Trump birthday note to Epstein says ‘May every day be another wonderful secret’ ” MSNBC (last visited on July 18, 2025) (<https://www.msnbc.com/all-in/watch/wsj-trump-birthday-note-to-epstein-says-may-every-day-be-another-wonderful-secret-243433029666>).

¹³ “Trump sent Jeffrey Epstein ‘bawdy’ 50th birthday letter: WSJ” CNBC (Last visited July 18, 2025) (<https://www.cnn.com/amp/2025/07/17/trump-jeffrey-epstein-birthday-letter-wsj.html>).

¹⁴ “Trump was Attempting to Block Publication of Embarrassing WSJ Jeffrey Epstein Story” VARIETY (last visited July 18, 2025) (<https://variety.com/2025/politics/news/trump-attempted-block-publication-wsj-jeffrey-epstein-story-1236463201/>).

¹⁵ “WSJ says Trump wrote racy birthday letter to Epstein. The president says it never happened.” POLITICO (last visited July 18, 2025) (<https://www.politico.com/news/2025/07/17/trump-epstein-wall-street-journal-00461787>).

¹⁶ “Trump Reportedly Told Epstein They Have ‘Certain Things in Common’ in Lewd Birthday Card: ‘May Every Day Be Another Wonderful Secret’ ” PEOPLE MAGAZINE (last visited July 18, 2025) (<https://people.com/trump-reportedly-told-epstein-they-have-certain-things-in-common-in-lewd-birthday-card-11690275>).

¹⁷ “Reported birthday card from Trump to Epstein shines new light on their friendship as fallout from files release mounts” THE INDEPENDENT (last visited July 18, 2025) (<https://www.independent.co.uk/news/world/americas/us-politics/trump-epstein-files-friendship-list-b2791282.html>).

¹⁸ “Trump news at a glance: Fallout from Epstein case widens as Trump threatens to sue WSJ” THE GUARDIAN (last visited July 18, 2025) (<https://www.theguardian.com/us-news/2025/jul/18/trump-administration-news-today>).

¹⁹ “Team Trump was on ‘F-cking Warpath’ to Kill Story About Salacious Letter to Epstein” ROLLING STONE (last visited July 18, 2025) (<https://www.rollingstone.com/politics/politics-features/trump-team-tried-kill-report-salacious-letter-epstein-1235388533/>).

defamatory, disparaging, and inflammatory statements contained therein have been seen by hundreds of millions of people.

42. All the above-referenced articles, posts, and false statements have resulted in overwhelming financial and reputational damages to President Trump, expected to be in the billions of dollars, due to the direct and implicit defamatory statements paraded throughout the Article.

43. All conditions precedent to the bringing of this action have occurred, been satisfied, or have otherwise been waived.

44. As a result of the Defendants' wrongful conduct, described herein, and Plaintiff's need to protect and enforce his legal rights, Plaintiff has retained the undersigned attorneys, and is required to pay attorneys' fees to prosecute this action.

COUNT I – DEFAMATION PER SE

45. Plaintiff repeats and realleges the allegations contained within paragraphs 1 through 44, *supra*, as if set forth herein.

46. The unprivileged statements set forth in the Article, including but not limited to those specified in paragraph 24 and all subparagraphs therein, made by Defendants to others about Plaintiff are false and defamatory.

47. At the time such statements were made, endorsed, authorized, and/or adopted by Defendants, Defendants knew or should have known that they were false and defamatory.

48. Defendants published such statements maliciously, with knowledge of the falsity of the statements, and/or with reckless disregard of their truth or falsity.

49. An overwhelming number of people all over the world read the false and defamatory statements contained in the Article.

50. The statements were not privileged.

51. The statements were published by Defendants with actual malice, oppression, and fraud in that they were aware at the time of the falsity of the publication and thus, made said publications in bad faith, out of disdain and ill-will directed towards Plaintiff without any regard for the truth.

52. Defendants possessed information and had access to information that showed their statements were false.

53. Defendants also made statements for which they had no factual basis.

54. Moreover, the statements tend to harm the reputation of Plaintiff as to lower his professional reputation in the community or deter third persons from associating or dealing with him and, as such, constitute defamation *per se*.

55. As a proximate result of the maliciously false and defamatory publication of statements to third parties by Defendants, Plaintiff has been damaged.

56. Because Defendants' defamatory statements constitute intentional acts which were made with actual malice towards Plaintiff, Plaintiff seeks an award for punitive damages.

WHEREFORE, Plaintiff President Donald J. Trump demands judgment against Defendants Dow Jones & Company, Inc. d/b/a The Wall Street Journal, News Corporation, Keith Rupert Murdoch, Robert Thomson, Khadeeja Safdar, and Joseph Palazzolo for damages, punitive damages, court costs, and such other relief as the Court deems just and proper, not to be less than \$10 billion dollars.

COUNT II – DEFAMATION PER QUOD

57. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 44, *supra*, as if fully set forth herein.

58. The unprivileged statements set forth in the Article, including but not limited to those specified in paragraph 25 and all subparagraphs therein, made by Defendants to others about Plaintiff are false and defamatory.

59. At the time such statements were made by Defendants, Defendants knew or should have known that they were false and defamatory.

60. Defendants published such statements maliciously, with knowledge of the falsity of the statements, and/or with reckless disregard of their truth or falsity.

61. An overwhelming number of people all over the world read the false and defamatory statements contained in the Article.

62. The statements were not privileged.

63. The statements were published by Defendants with actual malice, oppression and fraud in that they were aware at the time of the falsity of the publication and thus, made said publications in bad faith, out of disdain and ill-will directed towards Plaintiff without any regard for the truth.

64. Moreover, the statements tend to so harm the reputation of Plaintiff as to lower his professional reputation in the community or deter third persons from associating or dealing with him.

65. As a proximate result of the false and defamatory publication of statements to third parties by Defendants, Plaintiff has been damaged.

66. Because Defendants' defamatory statements constitute intentional acts which were made with actual malice towards Plaintiff, Plaintiff seeks an award for punitive damages.

WHEREFORE, Plaintiff President Donald J. Trump demands judgment against Defendants Dow Jones & Company, Inc. d/b/a The Wall Street Journal, News Corporation, Keith

Rupert Murdoch, Robert Thomson, Khadeeja Safdar, and Joseph Palazzolo for damages, punitive damages, court costs, and such other relief as the Court deems just and proper, not to be less than \$10 billion dollars.

DEMAND FOR JURY TRIAL

Plaintiff hereby requests a jury trial as to all issues so triable.

Date: July 18, 2025

Respectfully submitted,

BRITO, PLLC

2121 Ponce de Leon Boulevard
Suite 650

Coral Gables, FL 33134

Office: 305-614-4071

Fax: 305-440-4385

By: /s/ Alejandro Brito

ALEJANDRO BRITO

Florida Bar No. 098442

Primary: abrito@britopllc.com

Secondary: apiriou@britopllc.com

IAN MICHAEL CORP

Florida Bar No. 1010943

Primary: icorp@britopllc.com

Counsel for Plaintiff

President Donald J. Trump